



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 19, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Norstan Communications, Inc. dba Black Box Network Services
EB Docket No. 06-36; CPNI Certification CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Norstan Communications, Inc. dba Black Box Network Services.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwrightman@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: FCX1901

Enclosures
CW/im

**ANNUAL 47 C.F.R § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2018
Name of Company covered by this certification:	Norstan Communications, Inc. d/b/a Black Box Network Services
Form 499 Filer ID:	827433
Name of Signatory:	David J. Russo
Title of Signatory:	President and Treasurer


I, David J. Russo, certify that I am an officer of the company named above, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification, as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



David J. Russo
Norstan Communications, Inc. d/b/a Black Box Network Services

Date

2-15-2019

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A
 Explanation of actions taken against data brokers – not applicable
 Summary of customer complaints – not applicable

**ANNUAL 47 C.F.R § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Attachment A

Statement in Support of Certification for Calendar Year 2018

Norstan Communications, Inc. d/b/a Black Box Network Services

Norstan Communications, Inc. d/b/a Black Box Network Services (hereinafter referred to as the "Company") resells Voice over Internet Protocol ("VoIP") - related services (the "Services"). The Company does not market the Services to end users using CPNI in any fashion. The Company has not used or disclosed CPNI for any sales or marketing-related purpose or activities and the Company has not permitted any third parties to do so.

To the extent the Company has access to CPNI, including billed call detail, this information is accessible only to employees authorized by senior management, such as the Company's accounting/billing and accounts receivable/collection teams, which have access to such information only in connection with their respective functions. These employees have been trained that they are only permitted to use CPNI in connection with these permissible functions, and not for marketing purposes. The Company's Code of Ethics requires each employee to comply strictly with all federal, state and local laws and all foreign laws that apply to the activities of the Company, and, accordingly, prohibits the unauthorized use of CPNI. Violation of this Code of Ethics may subject the employee to discipline up to and including termination of employment.

The Company's VoIP customers do not have access to their account information via an online system. The Company does not have any retail locations and therefore does not disclose CPNI in-store.

The Company's services are billed directly by the Company and all customer service inquiries are handled by the Company. Disclosure of call detail information to customers over the telephone is only provided if the caller has the bill and can direct questions to customer service by providing specific call detail about which there are questions and, therefore, falls within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer issue.

With the exception of such customer service inquiries, the Company does not use CPNI for any marketing purpose for which customer approval is required. Should the Company expand its business in the future to include the marketing of services that involve the use of CPNI, it will follow the applicable rules set forth in 47 C.F.R. Subpart U for the use of CPNI in connection with such marketing activities.

Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided. The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

The Company has not taken any actions against data brokers in the last year. The Company did not receive any customer complaints about the unauthorized release of CPNI in the calendar year 2018.